

20-1351-RGA

Delaware: In The United States District Court

FILED

NOV 02 2020

US DISTRICT COURT
DISTRICT OF DELAWARELeo Brandon Farnsworth,
Plaintiff

N. Docket #

Complaint (Amended)

Joseph R. Biden, Jr.,

Jill Biden, Hunter Biden,

Office of the Attorney General for Delaware

Delaware State Police, Wilmington City District

Attorney's Office, Dept. of Forensic Examiner for
Delaware, & Curtis C. Dunn

Defendant(s)

Motion To Amend Complaint/Defendants By Leave

I. Jurisdiction & Venue

1) This is a civil/criminal complaint authorized by federal /state laws, and rights secured by the Constitution of the United States. The court has jurisdiction under 28 U.S.C. § 1331 and 1333(a)(3). Plaintiff Farnsworth seeks declaratory relief pursuant to 28 U.S.C. § 2201 and 2202. Plaintiff Farnsworth's claims for injunctive relief are authorized by 28 U.S.C. § 2283 & 2284 and Rule 65 of the Federal Rules of Civil Procedure.

2) The United States District Court of Delaware is an appropriate venue under 28 U.S.C. § 1331 (b) (2) because it is where the events giving rise to this claim occurred.

II. Plaintiff

3) Plaintiff Leo Brandon Farnsworth is an inmate within Virginia Department of Corrections. He is currently confined at Green Rock Correctional Center, 475 Green Rock Lane / P.O. Box 1000, Chatham, Virginia 24531-1000

4) Plaintiff files this claim in good faith due to he witnessed a crime in Delaware (Wilmington, Delaware) on /about October 15, 1972, and did so file a request with the Delaware State Police, pursuant to Freedom of Information Act, passed by Congress.

III Defendants (Amended)

5) Defendant Joseph Robert Biden, Jr. is the (former) V.P. of the United States, and is the Democratic nominee running as a candidate for the Office of the President of the United States. He is alleged to have feloniously, knowingly, and in wanton caused the murder of Neilia Hunter Biden (deceased) his first wife and Amy Biden, daughter (also deceased) on /about December 18, 1972.

6) Defendant Jill Biden is the (former) Second Lady, and wife to Joseph R. Biden, Jr., and was the person whom caused the murder along with husband Joseph R. Biden, Jr. of Neilia

Hunter Biden and Amy Biden on/about December 18, 1972

7) Defendant Hunter Biden is the only sole witness to the murder of his mother, Neilia Hunter Biden, and was told by Defendant(s) Joseph R. Biden, Jr. and Jill Biden to not tell the police (Delaware State Police) of the actual cause of the murders on December 18, 1972.

8) Defendant(s) Office of the Attorney General for Delaware is solely responsible for bringing charges against Joseph R. Biden, Jr. and Jill Biden for the murder(s) of Neilia Hunter Biden and Amy Biden, and refuses to answer querries related to a full disclosure of copies of police reports and other evidence and/or reopen the investigation of the deaths of Neilia Hunter Biden and Amy Biden.

9) Defendant(s) Delaware State Police is the investigative agency that would reopen the investigation into the murder plot of Neilia Hunter Biden and Amy Biden. (F.O.I.A. denial)

10) Defendant(s) Wilmington City District Attorney's Office is the agency whom would have prosecuted the case(s) of Joseph R. Biden, Jr. and Jill Biden for First Degree

Murder, Conspiracy To Commit First Degree Murder, and Wanton Misconduct by delaying, hindering, and/or impeding a criminal investigation.

- 11) Defendant(s) Department of Forensic Examiner's Office is solely responsible for the investigation into autopsy (cause of death) on/about December 18, 1972.
- 12) Defendant Curtis C. Dunn is the driver of the 18 wheeler (tractor trailer) that murdered Neilia Hunter Biden and Amy Biden on/about December 18, 1972.

IV Facts

- 13) Plaintiff Farnsworth prior to changing his name on/about October 7, 2007, was David Terry Kidd, Jr., and on October 15, 1972 he and his family was returning back from Maryland going through Wilmington, Delaware. Plaintiff was 9 years old at the time and he did so witness a 30 year old Joseph R. Biden, Jr. and a 40 year old black man at the McDonald's in Wilmington, DE at approx. 2:30 pm.
- 14) Defendant Joseph R. Biden, Jr. was witnessed handing an envelope to the black man whom was dressed in a mechanics looking outfit by Plaintiff on October 15, 1972.

15) Plaintiff Farnsworth had no knowledge of whom both men were, and it was not until an ad showing a 30 year old Joe Biden in the hospital after he was elected that the Plaintiff identified the person, he saw October 15, 1972

16) Plaintiff Farnsworth requested articles and information from the Delaware State Police, but was ignored (See Exhibit A For The Plaintiff)

17) Plaintiff Farnsworth requested information from the Delaware State Police, Wilmington District Attorney's Office, and Delaware Department of Forensic Examiner's Office, but the F.I.O.A. was ignored (See Exhibits B, C, D, and E for the Plaintiff)

18) On /about December 18, 1972, Defendant Joseph R. Biden and Jill Biden did so have an affair with each other which led to the murder of Neilia Hunter Biden and Amy Biden deliberately to receive a cash payout from a Life Insurance policy.

19) Neilia Hunter Biden was stopped at the intersection of Limestone Rd and Valley Road (Rte 7) in Delaware on December 18, 1972, which she had in the vehicle Joseph R. Biden, Jr.'s briefcase, election literature, and :

20) Plaintiff Farnsworth knows through media reports that Jill Biden was in Wilmington, DE the day of December 18, 1972 and had motive/intent/opportunity to push the Chevrolet station wagon into the traffic then was hit by Defendant Curtis C. Dunn, the driver of the 18 Wheeler. Defendant Jill Biden then left the scene of the murder to call her lover, Joseph R. Biden, Jr. in Washington, D.C.

Wherefore, Plaintiff seeks to have his day in court after an injunctive (preliminary) relief, which gives him access to any/all copies of evidence linked to the murders.

Respectfully,

Leo Brandon Farnsworth
Leo Brandon Farnsworth
#1024201

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475 Green Rock Lane
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Chatham, VA 24531-1000

Leo Brandon Farnsworth

Green Rock Cr.

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